

54389

SEP 19 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stephen W. Holt
 NL Industries, Inc.
 Corporate Environmental Services
 P.O. Box 1090
 Hightstown, N.J. 08520

Dear Mr. Holt:

On August 17, 1990, representatives of the U.S. Environmental Protection Agency (EPA), the New Jersey Department of Environmental Protection (NJDEP), NL Industries, Inc. (NL), EBASCO, and NL's consultant, O'Brien & Gere, met to discuss EPA's comments on the Draft Remedial Investigation (RI) Report, Volumes I & II, dated April 1990, for the NL Industries Superfund Site.

As stated in EPA's comments which were provided to you by letter dated August 7, 1990, and as discussed at the August 17 meeting, EPA indicated the need for additional sampling at the site to define the extent of site-related contamination more fully. The supplemental sampling which EPA has determined is required at this time is itemized below.

1. Resample wells 2R2, 13, 14, 15, 16, 17 and ~~18~~ for heavy metals. These wells are downgradient of well 2R2 where high heavy metals concentrations were detected.
2. An additional deep well must be installed adjacent to wells 7 and 12. It should be screened below the second confining zone, which may be greater than 100 feet deep. During the drilling of the well, continuous core samples should be taken at depths greater than well 12. After well development, this well must be sampled and analyzed for all priority pollutants.

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DATE ---->	9/18/90	9/18/90	9/18/90	9/18/90				

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3. Approximately ten (10) sediment and ten (10) surface water samples must be taken in depositional areas downstream between the site and the Delaware River. The first downstream sample should be sampled for all priority pollutants and the rest should be sampled for metals. Information such as pH, hardness, and conductivity for the water samples and pH, grain size and total organic carbon for the sediment samples must be taken.

The exact sampling location will be determined by EPA personnel or members of the Biological Technical Assistance Group (BTAG) on site at the time of sampling. They will direct the PRP to the desired sample location.

4. Resample the sediments and filtered water in wells 2R2, KD and SD, which have shown elevated levels of radionuclides. Michael Gilbert, the project manager, and Florie Caporuscio (212-264-0503) of EPA's Radiation Branch, can be consulted regarding the details of this sampling effort.
5. As NL contends that there may be alternate sources of contamination to the East Stream, this stream should be sampled upstream of the site to either support or refute NL's claim. It is NL's option to sample.

The results of this supplemental sampling effort must be received within ninety (90) calendar days after receipt of this letter.

In addition to the sampling specified above, as discussed in EPA's comments provided by letter dated August 7, 1990, an environmental assessment and wetlands delineation will be required sixty (60) calendar days after receipt of this letter.

All of the additional sampling and assessment requirements specified above should be submitted as part of a RI addendum. EPA does not concur with NL's position, as stated in the monthly progress report dated September 10, 1990, concerning the classification of the additional sampling as a "study," as referenced in the Administrative Order on Consent, April 30, 1986, Section II.E. The sampling will merely supplement the RI and it is not expected to alter its conclusions. Therefore, the Final RI report is due as previously scheduled. Failure to adhere to this schedule will result in the levying of penalties as stated in Section VII.D of the Administrative Order.

If you have any questions, please call Michael Gilbert of my staff at (212) 264-6418.

Sincerely yours,

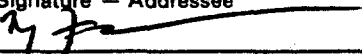
Raymond Basso, Chief
New Jersey Compliance Branch

cc: F. Hale, O'Brien & Gere
D. Rubin, EBASCO
C. Holstrom, NJDEP

bcc: J. La Padula, SNJCS
M. Gilbert, SNJCS
C. Fiske, ORC

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<p>3. Article Addressed to: Mr. Stephen W. Holt NL Industries, Inc. Corporate Environmental Services P.O. Box 1090 Hightstown, NJ 08520</p>	<p>4. Article Number 405 903 036</p> <p>Type of Service:</p> <table border="0"> <tr> <td><input type="checkbox"/> Registered</td> <td><input type="checkbox"/> Insured</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified</td> <td><input type="checkbox"/> COD</td> </tr> <tr> <td><input type="checkbox"/> Express Mail</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> </table> <p>Always obtain signature of addressee or agent and <u>DATE DELIVERED</u>.</p>	<input type="checkbox"/> Registered	<input type="checkbox"/> Insured	<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD	<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise
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